

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his )  
capacity as ATTORNEY GENERAL )  
OF THE STATE OF OKLAHOMA and )  
OKLAHOMA SECRETARY OF THE )  
ENVIRONMENT C. MILES TOLBERT,) )  
in his capacity as the )  
TRUSTEE FOR NATURAL RESOURCES )  
FOR THE STATE OF OKLAHOMA, )

Plaintiff, )

vs. )

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al, )

Defendants. )

- - - - -  
THE VIDEOTAPED 30(b)(6)  
DEPOSITION OF STEVEN PATRICK, produced as a  
witness on behalf of the Plaintiff in the above  
styled and numbered cause, taken on the 21st day of  
August, 2007, in the City of Fayetteville, County of  
Washington, State of Arkansas, before me, Lisa A.  
Steinmeyer, a Certified Shorthand Reporter, duly  
certified under and by virtue of the laws of the  
State of Oklahoma.

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**EXHIBIT**

**14**

1 MR. SANDERS: Bob Sanders for the Cal-Maine  
2 defendants.

3 VIDEOGRAPHER: Thank you. The witness may  
4 be sworn in.

5 STEVEN PATRICK  
6 having first been duly sworn to testify the truth,  
7 the whole truth and nothing but the truth, testified  
8 as follows:

9 DIRECT EXAMINATION

10 BY MR. RIGGS: 09:08AM

11 Q Would you state your name, please?

12 A Steven Wayne Patrick.

13 Q By whom are you employed, Mr. Patrick?

14 A Tyson Foods.

15 Q What is your job title? 09:08AM

16 A I am the director of EHS services.

17 Q What does EHS mean?

18 A Environmental health and safety.

19 Q How long have you held that position?

20 A I have been a director for three and a half 09:08AM

21 years, that entire time over environmental but also

22 in the past two years the health and safety became a

23 part of the responsibilities.

24 Q When did you first go to work for Tyson?

25 A In 2003. 09:09AM

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1 to any other sources where this information might be  
2 found, such as a university.

3 MR. GEORGE: David, is your question  
4 limited to studies relevant to the Illinois River  
5 watershed?

09:49AM

6 MR. RIGGS: I think it should be according  
7 to --

8 A Illinois River watershed? I am not aware.

9 Q Okay. Let's talk about the total amount of  
10 waste produced, not just what individual birds might

09:49AM

11 produce in the form of excrement. Let's look at  
12 Inquiry No. 11 now on that list, and I want you to  
13 tell me if you are the person designated to speak  
14 for the Tyson entities on that area and if you are  
15 prepared to do that.

09:49AM

16 A Yes to both.

17 Q Okay, and when I'm saying -- we're including  
18 Cobb-Vantress. I get a little confused about which  
19 witness is going to speak for them, but you're  
20 speaking for them and the three other Tyson  
21 entities; correct?

09:49AM

22 A Correct.

23 Q Does Tyson currently own, that is, any of  
24 those entities or directly operate or maintain  
25 houses in which their chickens are fed?

09:50AM

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1 A Yes.

2 Q Okay. Is it Cobb-Vantress only that does  
3 currently?

4 A Currently, yes.

5 Q All right. Okay, and what kind of chickens 09:50AM  
6 are in those houses?

7 A Well, at Cobb-Vantress you would have -- I  
8 would have to go back to the specifics in the  
9 Illinois River watershed, but typically  
10 Cobb-Vantress is the parents and grandparents and 09:50AM  
11 great grandparents and typically not what we would  
12 consider broilers. Cobb-Vantress makes the birds  
13 that they sell to other companies.

14 Q They're breeding stock; is that correct?

15 A Yes, that's correct. 09:50AM

16 Q Is that a good way of putting it?

17 A That's the best way of putting it. I wanted  
18 to be clear on what it was.

19 Q Okay. Did Tyson -- any of these other Tyson  
20 entities own or maintain houses in which its birds 09:51AM  
21 were fed at some other time? I know they don't now.

22 A Yes.

23 MR. GEORGE: In the Illinois River  
24 watershed?

25 MR. RIGGS: Yeah, in the Illinois River 09:51AM

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1 watershed.

2 A Yes.

3 Q And what kind of birds were in those houses  
4 which were owned and operated by Tyson?

5 A Well, I think we would have had broilers. I 09:51AM  
6 believe that's what would have been in there, and I  
7 would need to go back to verify, but I'm pretty sure  
8 we had broilers in them.

9 Q Do you know if Tyson, during that time it was  
10 owning and operating its own broiler houses in the 09:51AM  
11 Illinois River watershed, ever weighed or measured  
12 the amount of waste coming out of those houses when  
13 it was removed?

14 A On weighing, I do not have records of them  
15 weighing what was coming out of the houses. I did 09:52AM  
16 not have that information.

17 Q Do you know if they did or didn't do that?

18 A I am not aware of any weighing that was  
19 conducted.

20 Q Do you know if they measured it some other 09:52AM  
21 way, such as a truck load or by cubic feet or  
22 anything like that?

23 A I have no information on any kind of weight or  
24 measurement of what was coming out of the houses at  
25 these specific locations we're talking about in the 09:52AM

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